

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

RICK PERRY, *et al.*,

Defendants.

DECLARATION OF COLEMAN BAZELON

I, Coleman Bazelon, make the following declaration pursuant to 28 U.S.C. § 1746:

1. Pursuant to the agreement of the parties and this Court's minute order dated September 10, 2014, I hereby submit my second amended expert report (attached as Exhibit A) and amended reply report (attached as Exhibit B) in this matter. Consistent with the Court's order of September 10, these amended reports contain updated figures in light of Defendants' September 9, 2014 amendment to answers to the Deposition on Written Questions to the Texas Department of Public Safety (DPS).

2. The amended reports also reflect updated information regarding persons that DPS considers to be deceased, thus ensuring that no such persons are included in my calculation of the population of voters who must obtain an SB 14-compliant ID in order to vote in person. My previously filed reports did not reflect this information regarding deceased voters because I had not received the latest information in time to incorporate it into my analysis. The updated information has no material effect on my analysis but is included for completeness.

3. The substance of the amended reports attached to this Declaration otherwise remains the same as my first amended expert report and reply report filed on August 15, 2014. For clarity of the record, however, I wish to clarify one fact. In calculating the travel costs to obtain an Election Identification Certificate, *see* Exhibit A, Section VII, I assumed a starting departure time of 9:30am for trips taken via public transit. In my deposition and at trial, I testified that I used a departure time of noon. *E.g.*, Trial Tr. 122:23-25 (Day 6). That was incorrect. The amended reports attached to this Declaration, as well as the reports I previously filed on June 27, 2014 and August 15, 2014, all reflect an analysis that assumes a departure time of 9:30am for public transit. My calculations of the travel costs for the other two modes of travel I consider in my analysis—walking and taxi trips—are not dependent on, and are thus unaffected by, any choice of travel departure time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 17, 2014



Coleman Bazelon
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